

Felmy

United States District Court
Southern District of Texas
FILED

JUL 15 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States of America
v.

Case No. B-19-mJ-730

Hersel Lincoln MCKENZIE Jr

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of July, 12, 2019 in the county of Cameron in the Southern District of
Texas, the defendant violated 18 U.S.C. § 554,

an offense described as follows:

Knowingly exported or sent from the United States, or attempted to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: one AK-47 pattern rifle with magazine, three handguns, and 582 rounds of ammunition.

This criminal complaint is based on these facts:

On July 12, 2019, MCKENZIE departed the U.S. through the Los Indios Port of Entry at Los Indios, TX, driving a Nissan SUV. Mexican Customs denied his entry because his vehicle documents were reportedly not in order. MCKENZIE then sought admission to the U.S. and provided a negative declaration to Customs and Border Protection Officers for weapons, ammunition, and money over \$10,000. During a secondary inspection of the SUV, 552 rounds of ammunition, an AK-47 lower receiver and two handguns were discovered in a large speaker box. The rifle magazine, loaded with 30 rounds, was discovered under the dashboard. During a patdown, the AK-47 upper receiver and one handgun were discovered on MCKENZIE's person. During a post-Miranda interview, MCKENZIE admitted that all of the firearms belonged to him and that he knew it was illegal to take them to Mexico. MCKENZIE admitted concealing the firearms and ammunition in the SUV.

☐ Continued on the attached sheet.

Complainant's signature

Benjamin Grant, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: July 15, 2019

Judge's signature

City and state: Brownsville, Texas

Ronald G. Morgan, U.S. Magistrate Judge

Printed name and title